

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**JOHN L. STINSON, JR., SHARIKA
HORTON, NATHANIEL RAY
JOHNSON, HELEN MARIE
SCHLUETER, Plaintiffs,**

vs.

**LOCKHEED MARTIN
CORPORATION, Defendant.**

**CIVIL ACTION FILE NO.:
1:22-cv-01342-TWT**

JURY TRIAL DEMANDED

Please read this notice carefully. It impacts your legal rights under the Fair Labor Standards Act.

TO: Current and former fire fighters that worked for Lockheed Martin Corporation at either the Marietta, Georgia or Fort Worth, Texas location at some time during the period beginning three (3) years before [insert date of order] to the present.

THIS NOTICE HAS BEEN AUTHORIZED BY THE HONORABLE THOMAS W. THRASH, JR. UNITED STATES DISTRICT JUDGE

What is this notice?

The purpose of this notice is to (1) inform you that a collective action lawsuit exists that you might join, (2) advise you how your rights may be affected by this lawsuit, and (3) instruction you on the procedure for participating in this lawsuit, if you choose to do so.

Earlier this year John Stinson and other former Lockheed Martin firefighters filed a lawsuit against Lockheed Martin under the Fair Labor Standards Act. The lawsuit contends that current and former firefighters are owed overtime because Lockheed Martin allegedly only paid overtime on Kelly days. This policy created situations where fire fighters worked more than forty hours in a given week but did not receive an overtime premium for these hours. Plaintiffs claim that they and all other similarly situated firefighters are entitled to back wages and an additional amount of liquidated damages for hours they worked over forty per week.

Lockheed Martin retained Stanford G. Wilson, Sharon Morgan, Douglas H. Duerr of ELARBEE, THOMPSON, SAPP & WILSON, LLP and has responded to Plaintiffs' lawsuit by arguing that it properly paid Plaintiffs and that it did not violate the FLSA.

The Court has not reached any decision on the merits of the case. The case is currently at an early stage.

Why are you getting this notice?

Lockheed Martin's records indicate that you are a current or former fire fighter who worked at either the Marietta, Georgia or Fort Worth, Texas location between [insert date 3 years prior to Order] and present.

The term "fire fighter" means any individual whose job duties involve(d) suppressing fires. This includes the following job titles: firefighter, fireman, fireman "a", and lieutenant firefighter. Fire fighters who in addition to fire suppression duties also hold/held a fire inspector certification, EMT certification, and/or paramedic certification, are eligible to participate.

Your right to participate in the lawsuit.

You may join in this lawsuit if: (a) you worked at Lockheed Martin's Marietta, Georgia location or Fort Worth location at any time beginning [insert date] to present; and (b) you were a firefighter, as defined above.

It is entirely your decision whether to join this lawsuit. You are only required to take action if you desire to join. If you fit the definition above for those who may join the lawsuit, you may choose to join this action by mailing or faxing or emailing the attached signed Consent Form to Plaintiffs' attorneys:

HILL, KERTSCHER & WHARTON, LLP
ATTN: DOUGLAS R. KERTSCHER
3625 Cumberland Blvd SE Suite 105
Atlanta, GA 30339
TELEPHONE: (770) 953-0995
FAX: (770) 953-1358
EMAIL: drk@hkw-law.com

The Consent Form must be received by Hill, Kertscher & Wharton, LLP, on or before [insert date of 75 days after start sending notices].

Effects of joining the lawsuit.

If you join this action, you will be bound by any ruling, judgment, award, or settlement, whether favorable or unfavorable. While this lawsuit is proceeding, you may be required to provide information and documents, or otherwise participate in this action. If you file a Consent Form, your continued right to participate in this action will depend upon a later decision by the Court that you and the named Plaintiffs are “similarly situated” in accordance with applicable laws and that it is appropriate for this case to proceed as a collective action.

If you choose not to join this action, you will not be bound by any ruling, judgment, or settlement entered in this case, favorable or unfavorable. If you choose not to join this lawsuit, you may file a separate lawsuit on your own or choose to take no action at all.

If you choose to join this action, you may be able to recover damages only for hours worked within two or possibly three years of the date your Consent Form is filed. If you choose not to join in this action or file your own action, some or all of your potential claims may later be barred by the applicable statute of limitations.

No retaliation.

You have an absolute right to join this lawsuit free from any fear that Lockheed Martin will retaliate against you in any way.

The law prohibits retaliation against employees for exercising their rights under the FLSA. Therefore, Lockheed Martin is prohibited from discharging you or retaliating against you in any other manner because you choose to participate in this action.

If you believe you are being retaliated against, or if anyone acting on Lockheed Martin’s behalf threatens to retaliate against you at any time, you may seek legal counsel and ask for immediate relief in this Court. If your retaliation claims are successful, Lockheed Martin will be liable to you for damages caused by their retaliation.

Legal representation, if you join.

If you choose to join this case by filing a Consent Form, your interest will be represented by

HILL, KERTSCHER & WHARTON, LLP
DOUGLAS R. KERTSCHER
3625 Cumberland Blvd SE Suite 105
Atlanta, GA 30339
TELEPHONE: (770) 953-0995
FAX: (770) 953-1358
Website: www.hkw-law.com

Plaintiff's Counsel has taken this case on a contingency basis. Plaintiff's Counsel may be entitled to receive attorneys' fees and costs from Lockheed Martin should there be a recovery or judgment in Plaintiffs' favor. If there is a recovery, Plaintiffs' Counsel will receive part of any settlement obtained or money judgment entered in favor of all members of the class. If there is no recovery or judgment in Plaintiffs' favor, Plaintiffs' Counsel **will not seek any attorneys' fees or costs from you.** The specific terms and conditions will be contained in a fee agreement separately entered into by Plaintiffs' Counsel and you, if you decide to participate in this case.

Further information.

If you have questions about this notice or the lawsuit, you may contact Plaintiff's counsel, Hill, Kertscher & Wharton, LLP by calling (678) 384-7440.